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December 23, 2017

By ECF

Hon. Frederick Block
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: Dixon, et al., v. City of New York, et al.,
16 CV 6271 (FB) (RML)**

Dear Judge Block:

I represent plaintiffs and write to advise the Court that the parties have reached an agreement with respect to plaintiffs' right to legal fees and costs under the terms of the previously accepted Offers of Judgment. The parties were to submit a letter by December 22, 2017, concerning the status of these discussions, or otherwise request a pre-motion conference to discuss a motion by plaintiffs for these fees and costs, and we respectfully request that the Court deem this letter as timely filed, *nunc pro tunc*.

Plaintiff Dixon accepted a Rule 68 Offer of Judgment for \$25,001 on October 26, 2017. On November 9, 2017, plaintiff Hyland accepted a similar Offer of Judgment, also for \$25,001. Both offers provided plaintiffs with the right to recover legal fees and costs. The parties had been recently discussing a possible resolution of this outstanding matter and we reached an agreement as to the amount yesterday, December 22, 2017. We anticipate that paperwork memorializing the agreement will be executed shortly.

Thank you for your kind consideration.

Respectfully submitted,



Michael Lumer

cc: Nana Sarpong, ACC (By ECF)